## Case 5:20-cv-05799-LHK Document 182-1 Filed 09/20/20 Page 1 of 4

Production::Begin Bates	Production::End Bates	Production::Begin Attachment	Production::End Attachment	Email From	Email To	Email CC	Date	Author	File Name	Privilege	Privilege Description	Redaction	Privilege Objection/Response
OOC_0000222	DOC_0000222	DOC_0000221	DOC_0000222				4/13/2020 11:00	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Briefing Materials re Hill Conversation re June 1 Restart.docx	Predecisional and Deliberative	Draft document containing pre-decisional deliberations draft talking points on proposed Department action/decision/policy.	Withheld in full d	
OC_0000223	DOC_0000223	DOC_0000223	DOC_0000224	Ahmad, Ali M [ali.m.ahmad@census.gov]	Kelley, Karen (Federal) [KKelley@doc.gov]; Walsh, Michael (Federal) [MWalsh@doc.gov]; Foti, Anthony (Federal) [AFoti@doc.gov]	Dillingham, Steven [steven.dillingham@census.gov]; Jarmin, Ron S [ron.s.jarmin@census.gov]	4/13/2020 11:48	Ahmad, Ali M	Background Materials: Hill Talking Points and Draft Legislative Text	Predecisional and Deliberative	Email communication containing pre- decisional deliberations draft talking points on proposed Department action/decision/policy.	Redacted	
DOC_0000224	DOC_0000224	DOC_0000223	DOC_0000224				4/13/2020 11:48	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Briefing Materials re Hill Conversation re June 1 Restart.docx		Draft document reflecting mental processes of advisor to decisionmaker draft talking points on proposed Department action/decision/policy.	Withheld in full	
DOC_0000225	DOC_0000225	OOC_0000225	DOC_0000226	Ali Mohammad Ahmad (ENSUS/ADCOM FED) (ali.m.ahmad@census.gov)	Kelley, Karen (Federal) (KKelley@doc.gov]; Walsh, Michael (Federal) (MWalsh@doc.gov); Dillingham, Steven (steven.dilingham@census.gov); Jarmin, Ron S (ron.s.jarmin@census.gov); Lamas, Enrique (enrique.lamas@census.gov); Damas, Enrique (christad.jones@census.gov); Dapes, Christo (christad.jones@census.gov); Page, Benjamin J (benjamin.j.page@census.gov); Christy, James T (james.t.christy@census.gov)		4/13/2020 14:04	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Please Review- Updated Briefing Points w/ Next Steps	Predecisional and Deliberative	Email communication reflecting mental processes of advisor to decisionmaker draft talking points on proposed Department action/decision/policy.	Redacted	
DOC_0000226	DOC_0000226	DOC_0000225	DOC_0000226				4/13/2020 14:04	Ali Mohammad Ahmad	Updated Briefing	Predecisional and	Document reflecting mental processes of	Withheld in full	
								(CENSUS/ADCOM FED)	Materials re Hill Conversation re June 1 Restart.docx	Deliberative	advisor to decisionmaker proposed updates to Census schedule.		
DOC_0000248	DOC_0000248	DOC_0000247	DOC_0000248				4/13/2020 16:27	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Briefing Materials re Hill Conversation re June 1 Restart.docx	Predecisional and Deliberative	Document reflecting mental processes of advisor to decisionmaker draft talking points on proposed Department action/decision/policy.	Withheld in full	
DOC_0000249	DOC_0000249	DOC_0000249	DOC_0000251	Ali Mohammad Ahmad (CENSUS/ADCOM FED) [ali.m.ahmad@census.gov]	Gorey, Lauren (Federal) [LGorey@doc.gov]; Fotl, Anthony (Federal) [AFoti@doc.gov]; Ding, Michael (Federal) [MDing@doc.gov]; Brebbia, Sean (Federal) [Sirebbia@doc.gov]; Rockas, James (Federal) [Sacas@doc.gov]; Paranzino, Anthony (Federal) [AParanzino@doc.gov]	Walsh, Michael (Federal) [MWalsh@doc.gov]; Kelley, Karen [Federal) (Kkelley@doc.gov]; Dillingham, Steven [Steven.dillingham@census.gov]; Jarmin, Ron S [ron.s.jarmin@census.gov]	4/13/2020 16:50	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	QUICK REVIEW STATEMENT & TWO- PAGE SCHEDULE	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy.	Redacted	Objection: the DP privilege does not extend to factual materials, which must be segregated and released.
DOC_0000250	DOC_0000250	DOC_0000249	DOC_0000251				4/13/2020 16:50	Ali Mohammad Ahmad	FOR REVIEW DRAFT	Predecisional and	Document reflecting mental processes of	Withheld in full	
								(CENSUS/ADCOM FED)	Working Statement re 2020 Census Shift.docx	Deliberative	decisionmaker a draft public statement on proposed Department action/decision/policy.	r.	
DOC_0000251	DOC_0000251	DOC_0000249	DOC_0000251				4/13/2020 16:50	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	FOR REVIEW Operational Adjustment and Activities- WORKING DOCUMENT.docx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions proposed updates to Census schedule.	Withheld in full	
DOC_0000252	DOC_0000253	DOC_0000252	DOC_0000255	Gorey, Lauren (Federal) [LGorey@doc.gov]	Ding, Michael (Federal) [MDing@doc.gov]; Jarmin, Ron S [ron.sjarmin@census.gov]; Ahmad, Ali M [alim.ahmad@census.gov]; Chi, Anthony (Federal) [AFotigloc.gov]; Brebbia, Sean (Federal) [Sferbbia@doc.gov]; Rockas, Banse (Federal) [JRockas@doc.gov]; Paranzino, Anthony (Federal) [AParanzino@doc.gov]	[MWalsh@doc.gov]; Kelley, Karen	4/13/2020 17:06	Gorey, Lauren (Federal)	RE: QUICK REVIEW STATEMENT & TWO- PAGE SCHEDULE	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions a draft public statement on proposed Department action/decision/policy.	Redacted	Objection: the DP privilege does not extend to factual materials, which must be segregated and released.
DOC_0000254	DOC_0000254	DOC_0000252	DOC_0000255				4/13/2020 17:06	Ali Mohammad Ahmad	FOR REVIEW DRAFT	Predecisional and	Document containing information gathered	Withheld in full	
								(CENSUS/ADCOM FED)	Working Statement re 2020 Census Shift +OPA.docx	Deliberative	for pre- decisional deliberations a draft public statement on proposed Department action/decision/policy.	с	
DOC_0000255	DOC_0000255	DOC_0000252	DOC_0000255				4/13/2020 17:06	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	20-069751 Oman- Cisco_sec_03062020 +OPA 4.13.2020.docx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions a draft public statement on proposed Department action/decision/policy.	Withheld in full	
DOC_0000256	DOC_0000258	DOC_0000256	DOC_0000260	Ali Mohammad Ahmad (CENSUS/ADCOM FED) [ali.m.ahmad@census.gov]	Paranzino, Anthony (Federal) [AParanzino@doc_gov]; Gorey, Lauren (Federal) [LGorey@doc_gov]; Ding, Michael (Federal) [Moling@doc_gov]; Jarmin, Ron S [ron.s.jarmin@census_gov]; Foti, Anthony (Federal) [AFoti@doc_gov]; Brebbia, Sean (Federal) [SBrebbia@doc_gov]; Rockas, James (Federal) [JRockas@doc_gov]	Walsh, Michael (Federal) [MWalsh@doc.gov]; Kelley, Karen [Federal] (Kselley@doc.gov]; Dillingham, Steven [steven.dillingham@census.gov]	4/13/2020 17:17	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Re: QUICK REVIEW STATEMENT & TWO- PAGE SCHEDULE	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions a draft public statement on proposed Department action/decision/policy.	Redacted	
					•	•		1		1	1	1	•

## Case 5:20-cv-05799-LHK Document 182-1 Filed 09/20/20 Page 2 of 4

Production::Begin Bates	Production::End Bates	Production::Begin Attachment	Production::End Attachment	Email From	Email To	Email CC	Date	Author	File Name	Privilege	Privilege Description	Redaction	Privilege Objection/Response
OOC_0000259	DOC_0000259	DOC_0000256	DOC_0000260				4/13/2020 17:17	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	FOR REVIEW DRAFT Working Statement re 2020 Census Shift +OPA.docx	Predecisional and Deliberative	Document reflecting mental processes of advisor to decisionmaker a draft public statement on proposed Department action/decision/policy.	Withheld in full	
OOC_0000260	DOC_0000260	DOC_0000256	DOC_0000260				4/13/2020 17:17	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	FOR REVIEW- WORKING OPERATIONAL UPDATE w LG edits.docx	Predecisional and Deliberative	Document reflecting mental processes of advisor to decisionmaker a draft public statement on proposed Department action/decision/policy.	Withheld in full	
DOC_0000261	DOC_0000261	DOC_0000261	DOC_0000261				4/18/2020 16:16	johns225	3- DRAFT DOC Exec Report Slides- Data Updated Monday 4-20- 20.pdf	Predecisional and Deliberative	Document containing information gathered for pre- decisional deliberations a draft report on proposed Department action/decision/policy.	Withheld in full	
DOC_0000262	DOC_0000262	DOC_0000262	DOC_0000263	Olson, Stephanie (Federal) [SOlson@doc.gov]	Grossman, Beth (Federal) [bgrossman@doc.gov]; Page, Benjamin J [benjamin.j.page@census.gov]; Cannon, Michael (Federal) [MCannon@doc.gov]	Walsh, Michael (Federal) [MWalsh@doc.gov]	4/18/2020 20:06	Olson, Stephanie (Federal)	CUI//PRIV FW: Census Legislative Proposal for OMB Review	Attorney-Client Privilege; Predecisional and Deliberative	Email communication providing legal advice from Department counsel proposed updates to Census schedule.	Withheld in full	Objection: the DP privilege does not extend to factual materials, which must be segregated and released.  Objection: attorney(s) not identified and insufficient information to determine whether any attorney(s) is providing legal advice
DOC_0000263	DOC_0000263	DOC_0000262	DOC_0000263				4/18/2020 20:06		Draft Census Legislative Text for Congress 04.14.20 + OLC.docx	Attorney-Client Privilege; Predecisional and Deliberative	Draft document reflecting legal analysis proposed updates to Census schedule.	Withheld in full	Objection: attorney(s) not identified and insufficient information to determine whether any attorney(s) is providing legal advice
DOC_0000264	DOC_0000264	DOC_0000264	DOC_0000264	Walsh, Michael (Federal) [MWalsh@doc.gov]	Olson, Stephanie (Federal) [SOlson@doc.gov]; Grossman, Beth (Federal) [bgrossman@doc.gov]; Page, Benjamin J [benjamin; j.page@census.gov]; Cannon, Michael (Federal) [MCannon@doc.gov]		4/18/2020 20:08	Walsh, Michael (Federal)	Re: CUI//PRIV FW: Census Legislative Proposal for OMB Review )	Attorney-Client Privilege; Predecisional and Deliberative	Email communication providing legal advice from Department counsel proposed updates to Census schedule.	Withheld in full	Objection: the DP privilege does not extend to factual materials, which must be segregated and released.  Objection: attorney(s) not identified and insufficient information to determine whether any attorney(s) is providing legal advice
DOC_0000265	DOC_0000265	DOC_0000265	DOC_0000265				4/20/2020 0:36	Deborah Stempowski (CENSUS/DCMD FED)	TPs (high level) on post processing v.6.docx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions proposed updates to Census schedule.	Withheld in full	Objection: the DP privilege does not extend to factual materials, which must be segregated and released.  Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000266	DOC_0000266	DOC_0000266	DOC_0000266				4/20/2020 15:56	James T Christy (CENSUS/LA FED)	Copy of Post Processing Calculator.xlsx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions internal briefing materials on proposed Department action/decision/policy.	Withheld in full	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000267	DOC_0000267	DOC_0000267	DOC_0000269	Ron S Jarmin (CENSUS/DEPDIR FED) [Ron.S.Jarmin@census.gov]	Ahmad, Ali M [ali.m.ahmad@census.gov]; Walsh, Michael (Federal) [MWalsh@doc.gov]; Kelley, Karen (Federal) [KKelley@doc.gov]	Fontenot, Albert E [albert.e.fontenot@census.gov]; Christy, James T [james.t.christy@census.gov]; Lamas, Enrique [enrique.lamas@census.gov]	4/20/2020 15:59	Ron S Jarmin (CENSUS/DEPDIR FED)	Backgroiund	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy.	Redacted	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000268	DOC_0000268	DOC_0000267	DOC_0000269				4/20/2020 15:59	(CENSUS/ADDC FED)	Post Data Collecttion Narravtive-1.docx	Predecisional and Deliberative	Document containing information gathered for pre-decisional deliberations internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy.		Objection: the DP privilege does not extend to factual materials, which must be segregated and released.  Objection: the DP privilege does not extend to documents or information "gathered for pre-decisional deliberations," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000269	DOC_0000269	DOC_0000267	DOC_0000269				4/20/2020 15:59	James T Christy (CENSUS/LA FED)	Copy of Post Processing Calculator.xlsx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions proposed updates to Census schedule.	Withheld in full	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000329	DOC_0000329	DOC_0000329	DOC_0000329				4/27/2020 16:53	jeff bryant	4. NPC Reopening Status 2020.04.27.docx	Predecisional and Deliberative	Document reflecting information provided to facilitate deliberative discussions proposed Department action/decision/policy.	Withheld in full	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000330	DOC_0000330	DOC_0000330	DOC_0000330				4/27/2020 17:33		Notional Phased     Restart DOC Exec Slides     Apr 27 2020 ver 1 (6).pdf	Predecisional and Deliberative	Document containing pre-decisional deliberations proposed updates to Census schedule.	Withheld in full	
DOC_0000331	DOC_0000331	DOC_0000331	DOC_0000331				5/1/2020 19:38	Christopher Denno	Phased Start of Field Ops FOUO (005) final.pdf	- Predecisional and Deliberative	Document reflecting mental processes of advisor to decisionmaker internal briefing materials on proposed Department action/decision/policy.	Withheld in full	
DOC_0000332	DOC_0000332	DOC_0000332	DOC_0000333	DRisko@doc.gov	Kelley, Karen (Federal) [KKelley@doc.gov]		5/2/2020 19:59	DRisko@doc.gov	Fwd: Census Phased Resumption of Field Activities	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions a draft presentation on proposed Department action/decision/policy.	Redacted	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.

## Case 5:20-cv-05799-LHK Document 182-1 Filed 09/20/20 Page 3 of 4

Production::Begin Bates	Production::End Bates	Production::Begin Attachment	Production::End	Email From	Email To	Email CC	Date	Author	File Name	Privilege	Privilege Description	Redaction	Privilege Objection/Response
DOC_0000333	DOC_0000333	DOC_0000332	Attachment DOC_0000333				5/2/2020 19:59	Christopher Denno	Phased Start of Field Ops FOUO (005) final.pdf	-Predecisional and Deliberative	Document containing information gathered for pre- decisional deliberations internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy.	Withheld in full	Objection: the DP privilege does not extend to documents or information "gathered for pre-decisional deliberations," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.
DOC_0000334	DOC_0000334	DOC_0000334	DOC_0000335	Risko, Daniel (Federal)  (/o=EXCHANGELABS/OU=EXCHANGE AMMINISTRATIVE GROUP  (FYDIBOOHF23SPDLT)/CN=RCI PIENTS/C N=69966F04F7414063BA61A7 60CASEAE61- DANIEL RISK)	Kelley, Karen (Federal) [KKelley@doc.gov]		5/2/2020 19:59	Risko, Daniel (Federal)	Fwd: Census Phased Resumption of Field Activities	Predecisional and Deliberative	Email communication containing pre- decisional deliberations of arts correspondenc communicating proposed Department action/decision/policy.	e Redacted	
DOC_0000335	DOC_0000335	DOC_0000334	DOC_0000335				5/2/2020 19:59	Christopher Denno	Phased Start of Field Ops FOUO (005) final.pdf	-Predecisional and Deliberative	Document containing pre-decisional deliberations internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy		
DOC_0000355	DOC_0000355	DOC_0000355	DOC_0000355				5/4/2020 22:26	johns225	Phased Restart DOC     Exec Slides for     2020.05.04 Updated     (5).pdf	Predecisional and Deliberative	Document containing pre-decisional deliberations proposed updates to Census schedule.	Withheld in full	
DOC_0000356	DOC_0000356	DOC_0000356	DOC_0000356				5/4/2020 22:51	johns225		Predecisional and Deliberative	Document containing pre-decisional deliberations a draft report on proposed Department action/decision/policy.	Withheld in full	
DOC_0000357	DOC_0000357	DOC_0000357	DOC_0000357				5/4/2020 22:53	johns225	DOC Exec Report Slides for 2020.05.04 al late.pdf	Predecisional and Deliberative	Document containing pre-decisional deliberations a draft report on proposed Department action/decision/policy.	Withheld in full	
DOC_0000358	DOC_0000359	DOC_0000358	DOC_0000360	DRisko@doc.gov	Kelley, Karen (Federal) [KKelley@doc.gov]		5/4/2020 23:13	DRisko@doc.gov	Fwd: Census Phased Resumption of Field Activities	Predecisional and Deliberative	Email communication reflecting mental processes of advisor to decisionmaker a draf presentation on proposed Department action/decision/policy.	Redacted t	
DOC_0000360	DOC_0000360	DOC_0000358	DOC_0000360				5/4/2020 23:13	Christopher Denno	Phased Start of Field Ops FOUO (005) final.pdf	-Predecisional and Deliberative	Document containing pre-decisional deliberations internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy	Withheld in full	
DOC_0000361	DOC_0000362	DOC_0000361	DOC_0000363	Risko, Daniel (Federal)  [/O=EXCHANGELABS/OU=EXC HANGE ADMINISTRATIVE GROUP  (FYDIBOHF23SPDLT)/CN=RECI PINTS/C N=69966F04F7414063BA61A7 60CASEAE61- DANIEL RISK]	Kelley, Karen (Federal) [KKelley@doc.gov]		5/4/2020 23:13	Risko, Daniel (Federal)	Fwd: Census Phased Resumption of Field Activities	Predecisional and Deliberative	Email communication reflecting mental processes of advisor to decisionmaker a draf presentation on proposed Department action/decision/policy.	t Redacted	
DOC_0000363	DOC_0000363	DOC_0000361	DOC_0000363				5/4/2020 23:13	Christopher Denno	Phased Start of Field Ops FOUO (005) final.pdf	-Predecisional and Deliberative	Document containing pre-decisional deliberations internal briefing materials on proposed Department action/decision/policy	Withheld in full	
DOC_0000364	DOC_0000364	DOC_0000364	DOC_0000364				5/7/2020 12:20	CENSUS	Three Page Narrative- 1editARJ.docx	Predecisional and Deliberative	Draft document containing pre-decisional deliberations proposed updates to Census schedule.	Withheld in full	Objection: lack of required details regarding the information for which privilege is claimed and the information's pre-decisional, deliberative nature.
DOC_0000365	DOC_0000368	DOC_0000365	DOC_0000369	Ali Mohammad Ahmad (CENSUS/ADCOM FED) [ali.m.ahmad@census.gov]	Foti, Anthony (Federal) [AFoti@doc.gov]; Brebbia, Sean (Federal) [SBrebbia@doc.gov]	Walsh, Michael (Federal) [MWalsh@doc.gov]; Olson, Stephanie (Federal) [SOlson@doc.gov]	5/8/2020 19:29	Ali Mohammad Ahmad (CENSUS/ADCOM FED)	Re: Timeline Update	Predecisional and Deliberative	Email communication reflecting information provided to facilitate deliberative discussions internal deliberations among Department personnel, including counsel, on proposed Department action/decision/policy.	Redacted	Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.

## Case 5:20-cv-05799-LHK Document 182-1 Filed 09/20/20 Page 4 of 4

Production::Begin Bates	Production::End Bates	Production::Begin Attachment	Production::End Attachment	Email From	Email To	Email CC	Date	Author	File Name	Privilege	Privilege Description	Redaction	Privilege Objection/Response	Judicial Determination
DOC_0000369	DOC_0000369	DOC_0000365	DOC_000369				5/8/2020 19:29	CENSUS	2020 Operational Timeline v5 Clean.docx	Predecisional and Deliberative	Draft document reflecting information provided to facilitate deliberative discussions draft talking points on proposed Department action/decision/policy.	Withheld in full	Objection: lack of required details regarding the information for which privilege is claimed and the information's pre-decisional, deliberative nature.  Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.  Objection: even if applicable, the DP privilege does not prevent disclosure or this material in light of its importance and the need for its disclosure, which outweighs any harm in its production. The material describes the timeline under the COVID-19 plan and there is no colorable argument that disclosure details of the COVID-19 Plan in these circumstances would act to hinder frain and independent policy discussions regarding contemplated policies and decisions, when the COVID-19 Plan has since been abandoned in flavor of the Replan. Furthermore, Defendants have identified no other source for this information.	f of k
DOC_0000371	DOC_0000371	DOC_0000370	DOC_000371				5/8/2020 19:38	CENSUS	2020 Operational Timeline v5 Clean.docx	Attorney-Client Privilege; Predecisional and Deliberative	Oraft document containing communications among agency staff, including counsel, providing [lea] advice and analysis from counsel draft talking points on proposed Department action/decision/policy.	Withheld in full	Objection: lack of required details regarding the information for which privilege is claimed and the information's pre-decisional, deliberative nature.  Objection: the DP privilege does not extend to documents or information that "facilitate deliberative discussions," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.  Objection: even if applicable, the DP privilege does not prevent disclosure othis material in light of its importance and the need for its disclosure, which counted in the production. The material describes the timeline under the COVID-19 plan and there is no colorable argument that disclosure details of the COVID-19 plan has after a content and independent policy discussions regarding contemplated policies and decisions, when the COVID-19 plan has since been abandoned in favor of the Replan. Furthermore, Defendants have identified no other source for this information. Objection: attorney(s) not identified and insufficient information to determine whether any attorney(s) is providing legal advice	of k
DOC_0000441	DOC_0000441	DOC_0000440	DOC_0000441				5/11/2020 17:32	Akshay.Gupta@treasury gov	attachment 1.pdf	Predecisional and Deliberative	Document containing pre-decisional deliberations a draft report on proposed Department action/decision/policy.	Withheld in full	Objection: lack of required details regarding the information for which privilege is claimed and the information's pre-decisional, deliberative nature.	
DOC_0000442	DOC_0000442	DOC_0000442	DOC_0000442				5/14/2020 12:36	Dominic R Beamer (CENSUS/DCMD FED)	2. 2020 Nonresponse Followup Overview Presentation 05.18.20.pdf	Predecisional and Deliberative	Document containing information gathered for pre- decisional deliberations internal briefing materials on proposed Department action/decision/policy.	Withheld in full	Objection: the DP privilege does not extend to documents or information "gathered for pre-decisional deliberations," but only applies to pre-decisional deliberative materials themselves. By Defendants' own statements, the DP privilege is inapplicable.  Objection: lack of required details regarding the information for which privilege is claimed and the information's pre-decisional, deliberative nature.	